DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

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FINAL

ENVIRONMENTAL ASSESSMENT

Project Name:	Milwaukee Roundhouse CECRA Site Passenger Refueling Area VCRA Program Remediation
Proposed Implementation Date:	October 2021
Proponent:	City of Deer Lodge
Location:	46.400205, -112.738670
County:	Powell County

I. TYPE AND PURPOSE OF ACTION

The DEQ lists the Milwaukee Roundhouse Area (MRA) as a High Priority state CECRA (Superfund) site. This site was listed between 1987-1989. Since that time there has been a patchwork of investigations and remediation activities but with the recent approval of the VCRA EA by the DEQ, the State of Montana is now in the best position in decades to finally remove some of the remaining, lingering contamination of soils and groundwater remaining at this site.

Currently there remains contaminated surface soils and a dissolved petroleum product plume in the shallow aquifer. The community and the environment need the State to continue what has been started with the RI work and get this site on the path to closure.

The project objectives are to 1) update the soils and groundwater characterization so 2) remaining contaminated soils and groundwater can be removed or remediated with the goal to close and delist this State Superfund site so that the community can move forward with additional public and private funding and volunteer support to realize their wish for an open space park and non-motorized trail that can convert this State Superfund Site from a liability to an amenity.

Removal of the hazardous waste material and petroleum products in soils and groundwater from this site is permanent. These removal actions will repair, reclaim, and mitigate environmental damage to natural resources from historic mineral development and railroad operations.

The MRA site is in the City of Deer Lodge in Powell County. The PRA portion of the site is north and east of Clark Fork River and overlaps portions of the Clark Fork River Operable Unit Federal Superfund site.

DNRC approved the grant to provide funding for the Milwaukee Roundhouse CECRA Site Passenger Refueling Area VCRA Program Remediation Project.

II. PROJECT DEVELOPMENT

1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED:

Provide a brief chronology of the scoping and ongoing involvement for this project. List number of individuals contacted, number of responses received, and newspapers in which notices were placed and for how long. Briefly summarize issues received from the public.

DNRC – CARDD Program Specialists will post this EA for scoping at a minimum of two weeks and attach all

comments submitted by the public. This process provides DNRC the ability to review the public comment and address them appropriately through a subsequent Decision Notice.

2. OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION, LIST OF PERMITS NEEDED:
Examples: cost-share agreement with U.S. Forest Service, 124 Permit, 3A Authorization, Air Quality Major Open Burning Permit.

This project is working closely with the City of Deer Lodge, Powell County and the DEQ, to identify the appropriate activities and statutory and regulatory standards and necessary permits. At this time, we have identified the following permits necessary for this project:

- MDEQ Stormwater Discharge General Permit for Construction Activities
- USACE Nationwide Permit 38: Cleanup of Hazardous and Toxic waste in a Wetland
- Additional stream permitting may be necessary for in-stream sampling events
- DEQ Temporary Turbidity (318 Authorization).
- DEQ 401 Water Quality Certification (provided with Nationwide Permit 38)

In addition, we will require any contractors working on this project to have the necessary training, certifications and insurance to perform work on a CECRA Hazardous Waste site. Additional information on Statutory and Regulatory Standards as well as the overall scope of work for the project is located in the VCRA Remediation Proposal attached with the application.

3. ALTERNATIVE DEVELOPMENT:
Describe alternatives considered and, if applicable, provide brief description of how the alternatives were developed. List alternatives that were considered but eliminated from further analysis and why. Include the No Action alternative.

1. Characterize, Remove and Dispose of Contaminated Soils, Groundwater Remediation: The details of this alternative is discussed in detail in the Remediation Proposal. In summary, the City of Deer Lodge would utilize RDGP funds to contract remaining characterization soils, groundwater and proceed with the removal and disposal of as much on the on-site metals contaminated soil and remediation of groundwater as possible.

2. No Action Alternative. The impact of this alternative would be to both freeze in time the progress on remediation of this site as well as prevent the citizenry of Deer Lodge and the state of Montana from moving forward with additional public and private funding and volunteer support to realize their wish for an open space park and non-motorized trail that can convert this State Superfund Site from a liability to an amenity.

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:
Consider the presence of fragile, compactable or unstable soils. Identify unusual geologic features. Specify any special reclamation considerations. Identify direct, indirect, and cumulative effects to soils.

A NRCS web soil survey report was developed for this project (https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx). The primary soil types were Cetrack loam (42.5%5), Gregson loam (23.9%) Tetonview loam (23.6%) and six percent or less of Aquents-Slickens complex, Tentonview-Blossber loams, and Beaverell cobbly loams. Cetrack soils are mainly used for irrigated cropland; some areas used for rangeland. Beaverell soils are used for irrigated small grain, irrigated hay and

pasture, and as rangeland. Gregson series soils are used as pastureland and hayland and Tetonview soils are used for range and irrigated hayland and pasture.

The Deer Lodge Valley is filled with a great mass of material (valley fill) eroded from the surrounding mountains and with smaller amounts of volcanic ejecta. A series of gravimetric profiles indicate a maximum thickness of more than 5,500 ft of valley fill on a basement profile of moderate relief. The valley fill consists mostly of unconsolidated to semi-consolidated Tertiary sedimentary deposits. An average of about 25 feet of this material consists of Quaternary alluvium associated with the Clark Fork River (Konizeski, et al., 1968). Slopes in the project area are generally less than 5%; however, there is a 3:1 slope embankment from the historic railroad grade. There is no specific or unique seismic activity in this area http://www.mbmg.mtech.edu/pdf/SP114-earthquakemap.pdf.

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area may have potentially short term adverse minor impacts to local soil resources during construction activities and the removal of several feet of contaminated soils; however, this is a non-recurring event and there is an anticipated long-term benefit to this resource from the removal of contaminated materials (lead and arsenic) from the soil. This proposed project builds on previous work initiated by the Montana DEQ (Tri-Hydro 2015, 2015 & 2016 a & b) resulting in a cumulative long-term benefit to this resource.

No Action – The impact of no action will leave these contaminated soils in place which will continue to degrade the quality of the resource and limit future land use potential.

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5. WATER QUALITY, QUANTITY AND DISTRIBUTION:
Identify important surface or groundwater resources. Consider the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality. Identify direct, indirect, and cumulative effects to water resources.

Shallow groundwater resources at the PRA site are currently contaminated with residual hydrocarbon plumes from previous operations at the site. This shallow groundwater is currently not being used as a resource. There is a deeper, confined aquifer that was previously being used as part of the City's public water supply, but that source has been discontinued due to the prevalence of naturally occurring arsenic which exceeds the Federal drinking water standard of 10 parts per billion.

Cottonwood Creek is a perennial stream located on the northern portion of the PRA and also forms a portion of the northern limits of the PRA boundary closer to the Clark Fork River. The Clark Fork River is located approximately 200 feet west of the PRA and the Kohrs-Manning Irrigation ditch is also located approximately 200 feet west of the PRA. There is a wetland complex located both north and south of Cottonwood Creek between the historic Milwaukee Railroad line and the currently active Burlington Northern Santa Fe (BNSF) railroad line that forms the eastern boundary of the project area. There are no known additional irrigation systems, springs or other surface water features located in the PRA boundary.

The project area, by definition, is located outside of the floodplain for the Clark Fork River because the Clark Fork River and it's 100-year floodplain are part of the Clark Fork River Operable Unit of the Clark Fork River/Milltown Reservoir Superfund Site. There is also a floodplain associated with Cottonwood Creek. The FEMA portal for these maps provides information for Deer Lodge, Montana, https://msc.fema.gov/portal/home. There is currently no activity in the project area and the only structure in the project area within the floodplain of Cottonwood Creek is the old Milwaukee Railroad Trestle that is now used intermittently by the City of Deer Lodge to cross from the south portion of the site to the north, undeveloped portion of the site.

Proposed Alternative -- The preferred alternative of removing the remaining contaminated soils on city of Deer Lodge property with the PRA may have a short-term temporary adverse impact on local groundwater quality as the vadose zone is disturbed during soil removal activities, however, this impact is anticipated to be non-recurring and long-term impacts to groundwater quality are not anticipated with this alternative.

The proposed alternative of contaminated soil removal from the project area could possibly result in short term, minor local water quality impacts resulting from uncontrolled storm water runoff. However, the contractor will be required to get a General Permit for Storm Water Discharges Associated with Construction Activity https://deq.mt.gov/files/Water/WQInfo/Documents/MT-17-09/MT%2017-092017_DPER_MTR100000_edited.pdft for stormwater discharge from the Montana DEQ and prepare a Stormwater Pollution Prevention Plan (SWPPP) and implement and maintain stormwater best management practices (BMPs) This impact is anticipated to be non-recurring. There are long term benefits to surface water resources with the proposed soil removal action as this work will remove this source of contamination that can impact surface water resources.

The proposed alternative of contaminated soil removal from the project area will not likely have any impact on the floodplain as no work is occurring that could directly or indirectly impact the floodplain of the Clark Fork River or Cottonwood Creek.

No Action – No action will have no impact on the groundwater resource; however, the residual petroleum is slowly being attenuated via natural biological and physical processes. No action could also continue to cause contaminants in the soil to pollute surface water resources. A no action alternative will have no impact on the floodplains or flood management.

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6. AIR QUALITY:

What pollutants or particulate would be produced (i.e. particulate matter from road use or harvesting, slash pile burning, prescribed burning, etc)? Identify the Airshed and Impact Zone (if any) according to the Montana/Idaho Airshed Group. Identify direct, indirect, and cumulative effects to air quality.

The project area is not identified as part of any nonattainment area per the Montana DEQ Air Quality Nonattainment Status list. https://deq.mt.gov/air/Programs/planandrule.

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area could generate some relatively minor amounts of fugitive dust on a localized, temporary basis during excavation and transportation activities. These impacts will be managed by wetting, which will control dust and any lead adhering to dust particles. Remedial actions will be halted if significant dust is generated and will not resume until adequate dust control measures are in place. This minor, temporary adverse impact is anticipated to be non-recurring as disturbed areas on the site will be revegetated in accordance with the Montana Department of Environmental Quality General Permit for Storm Water Discharges Associated with Construction Activity https://deq.mt.gov/files/Water/WQInfo/Documents/MT-17-09/MT%2017-092017_DPER_MTR100000_edited.pdf which will be necessary for this project since there will be greater than one acre of disturbance at this site.

No Action – No impact to air quality.

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7. VEGETATION COVER, QUANTITY AND QUALITY:

What changes would the action cause to vegetative communities? Consider rare plants or cover types that would be affected. Identify direct, indirect, and cumulative effects to vegetation.

The site vegetation currently consists of western wheatgrass, sedges and bromes with willows located in the riparian areas in the vicinity of Cottonwood Creek.

Proposed Alternative – There will be minor temporary adverse impacts to vegetation and associated habitats during contaminated soil removal activities. These temporary direct impacts to these vegetation and habitat resources could indirectly impact various wildlife and aquatic species at or in the vicinity of the project area on a temporary or seasonal basis. These direct and indirect impacts are anticipated to be local and non-recurring. However, after soil removal activities are completed, revegetation will occur during the first appropriate period for favorable planting conditions and within 90 days of final seedbed preparation and annual inspection of revegetation efforts will be performed until the revegetation is successful. No trees are anticipated to be disturbed during this project and this work is anticipated to occur outside of the nesting

season. No work or direct impacts are anticipated to the river or creek that could potentially affect these habitats. There is a long-term beneficial impact to these vegetation and wildlife species and habitats including fish, by the removal of contaminated soils from the project area.

No Action – No action could continue to cause contaminants in the soil to pollute the environment and directly and indirectly impact these resources.

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8. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS:
Consider substantial habitat values and use of the area by wildlife, birds or fish. Identify direct, indirect, and cumulative effects to fish and wildlife.

The project is in city limits, adjacent to the municipal utility maintenance shop and an active railroad line. The current vegetation community supports a variety of western wildlife including white tail deer, great blue heron, golden eagles, owls, and various songbirds. A variety of trout species are likely present in Cottonwood Creek and the Clark Fork River, including Westslope Cutthroat Trout and Bull Trout.

Proposed Alternative – There will be minor temporary adverse impacts to vegetation and associated habitats during contaminated soil removal activities. These temporary direct impacts to these vegetation and habitat resources could indirectly impact various wildlife and aquatic species at or in the vicinity of the project area on a temporary or seasonal basis. These direct and indirect impacts are anticipated to be local and non-recurring. However, after soil removal activities are completed, revegetation will occur during the first appropriate period for favorable planting conditions and within 90 days of final seedbed preparation and annual inspection of revegetation efforts will be performed until the revegetation is successful. No trees are anticipated to be disturbed during this project and this work is anticipated to occur outside of the nesting season. No work or direct impacts are anticipated to the river or creek that could potentially affect these habitats. There is a long-term beneficial impact to these vegetation and wildlife species and habitats including fish, by the removal of contaminated soils from the project area.

No Action – No action could continue to cause contaminants in the soil to pollute the environment and directly and indirectly impact these resources.

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9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:
Consider any federally listed threatened or endangered species or habitat identified in the project area. Determine effects to wetlands. Consider Sensitive Species or Species of special concern. Identify direct, indirect, and cumulative effects to these species and their habitat.

An ESA analysis has been performed in the vicinity of the PRA and according to the June 28, 2021 US Fish and Wildlife Service (USFWS) countywide endangered, threatened, proposed and candidate species list there are four species present in Powell County. These four species are Grizzly Bear (Listed Threatened), Canada Lynx (Listed Threatened, Critical Habitat), Bull Trout (Listed Threatened, Critical Habitat), and Whitebark Pine (proposed) are listed.

There have been no sightings of grizzly bears, Canada lynx, or whitebark pine at the PRA. The PRA is located on the edge of town and may provide habitat for wildlife, but there are other more attractive nearby areas that support grizzly bears and Canada lynx. There are no features at the PRA that are particularly attractive to these species. According to Final Bull Trout Critical Habitat Designation (9/30/2010) the Clark Fork River is designated Bull Trout Critical Habitat.

The US Fish and Wildlife Service National Wetland Inventory Mapper (https://www.fws.gov/wetlands/data/Mapper.html) identifies potential wetland areas associated and within the floodplain of the Clark Fork River and its tributaries within a one mile perimeter of the Deer Lodge PRA CECRA site including Cottonwood Creek that flows through the project area, Johnson Creek located approximately 0.25 miles to the north of Cottonwood Creek and the Kohrs-Manning irrigation ditch.

Project Area - jurisdictional wetlands delineated during the September 9, 2020, wetland field investigation include a 0.37 acre riparian zone on the east side of the PRA along the boundary with the BNSF Railroad Right-Of-Way south of Cottonwood Creek and a narrow 0.08 acre riparian zone associated with possible historical ditching on the east side of the PRA along the boundary with the BNSF Railroad Right-Of-Way north of Cottonwood Creek. Previous work by the DEQ identified contaminated soils within wetland areas south of Cottonwood Creek within the PRA (TriHydro 2015).

Proposed Alternative – No activities are planned in the floodplain or area surrounding the Clark Fork River that could potentially affect Bull Trout. In the event any ESA species are encountered during remedy implementation, work will stop and the City will consult with the Fish and Wildlife Service.

The proposed alternative would remove the contaminated soils from the wetland areas within the PRA—a long term direct benefit to this resource; however, in order to do so there would be temporary direct and indirect minor impacts to portions of these localized wetlands during construction activity. Direct impacts include the removal of contaminated soils from approximately 0.05 acres of wetlands, and indirect temporary impacts could result from upland construction activities (storm water runoff for example) causing sedimentation in wetlands. These temporary direct and indirect impacts would be mitigated by adhering to all requirements of the Army Corps of Engineers 404 nationwide permit 38 for impacts to jurisdictional wetlands that will be required in order to perform this cleanup of hazardous materials work within the wetlands. These impacts are anticipated to be non-recurring.

No Action – No action could continue to cause contaminants in the soil to pollute the environment and directly and indirectly impact these unique, endangered, fragile, and limited resources.

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10. HISTORICAL AND ARCHAEOLOGICAL SITES:

Identify and determine direct, indirect, and cumulative effects to historical, archaeological or paleontological resources.

The project area currently has only two buildings, the city utility shop and the Park Street Well house; neither of which will be materially affected by the proposed project. There are residences to the south of the city utility shop and east of the active rail line that could potentially be impacted by current nuisances from the property; however, the project area and current activities thereon are not known impact any historic cultural or archeological resources.

Proposed Alternative -- The proposed alternative of contaminated soil removal from the project area is similar to past soil removal actions undertaken by the DEQ as part of the Montana Senate Bill 96 (2015) Orphan Share Funding soil removal actions. These previous soil removal activities were not known or reported to impact any of these resources; therefore, the proposed action is also not believed to impact these resources. However, if previously unknown cultural or paleontological materials are identified during project related activities, all work will cease until a professional assessment of such resources can be made.

No Action – The no action alternative will have no impact on historic cultural or archeological resources, if any, that may be present at this site.

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11. AESTHETICS:

Determine if the project is located on a prominent topographic feature, or may be visible from populated or scenic areas. What level of noise, light or visual change would be produced? Identify direct, indirect, and cumulative effects to aesthetics.

The project area is located on a nondescript parcel of land between the Clark Fork River and an active railroad line. To the north is Cottonwood Creek and the Grant-Kohrs Ranch National Historic Site. To the south are residential properties, businesses, a church, daycare, and the city utility shop. The area is not in a prominent location and is not remarkable for its visual quality.

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area will result in minor, localized, temporary visual impacts from construction activity; however, there will be no long-term visual impacts as the site will be restored to pre-project conditions. These adverse impacts are anticipated to be non-recurring.

No Action – No impact to aesthetics.

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12. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY:
Determine the amount of limited resources the project would require. Identify other activities nearby that the project would affect. Identify direct, indirect, and cumulative effects to environmental resources.

The project area is currently an open meadow with only two buildings (the city utility shop and the Park Street well house) owned by the City of Deer Lodge. The Park Street well is currently not in service so does not use any power. The existing energy uses are minimal and would likely only consist of power to the buildings and for to and from the site transportation.

Proposed Alternative –The proposed alternative of contaminated soil removal from the project area will result in localized, temporary minor additional energy consumption directly from construction activity. Existing energy uses will not be affected by this project and these temporary impacts on energy resources are anticipated to be non-recurring.

No Action – No impact to demands on environmental resources of land, water, air, or energy.

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13. OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA:
List other studies, plans or projects on this tract. Determine cumulative impacts likely to occur as a result of current private, state or federal actions in the analysis area, and from future proposed state actions in the analysis area that are under MEPA review (scoped) or permitting review by any state agency.

- City of Deer Lodge – Voluntary Cleanup Remediation Proposal for the Montana Department of Environmental Quality
- MDEQ Stormwater Discharge General Permit for Construction Activities
- USACE Nationwide Permit 38: Cleanup of Hazardous and Toxic waste in a Wetland
- Additional stream permitting may be necessary for in-stream sampling events
- DEQ Temporary Turbidity (318 Authorization).
- DEQ 401 Water Quality Certification (provided with Nationwide Permit 38).

IV. IMPACTS ON THE HUMAN POPULATION

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

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14. HUMAN HEALTH AND SAFETY:
Identify any health and safety risks posed by the project.

There are no dwelling structures on the property, just the city utility shop and the Park Street well house, and the site is not accessible or accessed by the public. Current conditions appear to have no impact public health and safety.

Hazardous Facilities – The DEQ lists the Milwaukee Roundhouse Area (MRA) as a High Priority state CECRA (Superfund) site. This site was listed between 1987-1989. There are some overhead power lines that cross the property but besides residual soil and groundwater contamination there are no other known hazardous

facilities at this site.

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area will have a long-term beneficial impact on the overall public health. There are also anticipated to be long term cumulative benefits of all the past and proposed soil removal actions on public health in this community and the state. There may be some localized, short term, minor, non-recurring temporary adverse health effects during construction activity, borne primarily by construction workers exposed to contaminated soil. However, these impacts can be minimized and avoided to the extent possible by proper training, equipment and safety practices. The contractor (and all persons working on the site will be required to have a minimum of 24 hour (most workers will be required to have a 40 hour) United States Department of Labor Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) required training.

Hazardous Facilities – This proposed alternative of contaminated soil removal from the project area builds on previous work initiated by the Montana DEQ resulting in a cumulative long-term benefit to this resource by removing the remaining known soil contamination that remained after the DEQ completed their soil removal activities in 2015 and 2016 (Tri-Hydro 2015 & 2016 a & b).

No Action – No impact to public health and safety.

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15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:
Identify how the project would add to or alter these activities.

At the present time this is city-owned property containing the city utility shop and the Park Street well house (not in service). The remainder of the property is open space used as a stockpile and equipment storage area for the city of Deer Lodge and is not used for specific commercial or industrial facilities.

The property is currently owned by the City of Deer Lodge which does not hay or graze the property except occasionally for the management of weeds and for fire protection considerations. Based on the NRCS web soil survey report developed for this project (https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx) the following soil types within the project area are prime farmland if irrigated: Cetrack loam and Gregson loam. In addition, the Beaverell cobbly loam is recognized as a farmland of local importance. The remainder of the soils making up the remainder 1/3 of the project area are not designated prime farmland, meaning approximately 2/3 of this property could be used for agricultural purposes but is essentially not used for this purpose.

Expanding the NRCS soil inventory out approximately one mile from the project area indicates that this trend continues with approximately 30% of the soils in the surrounding area is also considered prime if irrigated and 43% is farmland of statewide importance with the remaining 27% not considered prime farmland.

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area will not induce any changes to the production, and activity, growth or decline of commercial or industrial facilities. The proposed alternative would remove the contaminated soils from the agricultural lands within the PRA—a clear benefit to this resource; however, to do so there would be minor, non-recurring temporary impacts to these local resources. Topsoil would be salvaged and reused in these areas as part of the project to the extent possible to mitigate some of the adverse impacts associated with the contaminated soil removal activities.

No Action – No action would continue contaminate in the soil in these fallow agricultural lands.

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16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:
Estimate the number of jobs the project would create, move or eliminate. Identify direct, indirect, and cumulative effects to the employment market.

There is no economic activity or local employment currently at the site except for the city utility shop area which will not be affected by the proposed project.

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area will potentially have a direct beneficial, short-term impact as the construction work would likely be performed by contractors within the region.

No Action – No impact to quantity and distribution of employment.

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17. LOCAL AND STATE TAX BASE AND TAX REVENUES:

Estimate tax revenue the project would create or eliminate. Identify direct, indirect, and cumulative effects to taxes and revenue.

Since the property is owned by the City of Deer Lodge there are no property taxes paid on these parcels and since there is no direct labor or industry occurring at the site, there are no payroll taxes generated by the site.

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area will potentially have a beneficial, short-term impact on the state tax base through payroll taxes and fuel taxes, a portion of which are paid to local entities. However, because there is essentially no sales tax in Montana there is no local tax benefit from the proposed alternative.

No Action – No impact to local and state tax base and tax revenues.

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18. DEMAND FOR GOVERNMENT SERVICES:

Estimate increases in traffic and changes to traffic patterns. What changes would be needed to fire protection, police, schools, etc.? Identify direct, indirect, and cumulative effects of this and other projects on government services

The project area is currently an open meadow with only two buildings (the city utility shop and the Park Street well house) owned by the City of Deer Lodge. This area is served by a local street network owned and maintained by the city and state. There is an active railroad line that forms the eastern boundary of the project area operated by Burlington Northern Santa Fe (BNSF) within the project area. The Powell County airport is located west of the Clark Fork River over one mile west, southwest of the project area. There are no known transportation capacity issues in the vicinity of the project area.

At the present time there is no demand for the provision of government services and facilities (educational, health, medical, police, and fire) for the use and operation of these city parcels that form the project area. This area is used as a stockpile and equipment storage area for the city of Deer Lodge and is not open or available to the general public.

Proposed Alternative – As stated in the physical environmental section, the proposed alternative of contaminated soil removal from the project area is anticipated to be the first critical step for the potential for redevelopment of this property into an open space park concept that can serve the community of Deer Lodge and the residents of Montana with a variety of compatible uses include a new access to the Clark Fork River, a trail system and picnic areas. However, there is no anticipated impact to the provision of government services and facilities (educational, health, medical, police, and fire) with the proposed alternative and the creation of an open space park is a separate action which may or may not happen therefore there will be no impact on community or government services from the proposed action. The proposed alternative of contaminated soil removal from the project area will have a direct temporary impact on the local road network in the area when the contaminated soil is removed via covered trucks and transported to the landfill. However, the number of trucks per hour (estimated to be up to 10-12 per hour) would have an almost negligible impact on the capacity of the local streets and roads. This adverse impact is anticipated to be non-recurring after construction activities are completed. These loads will be required to be covered and there are no weight restrictions on the roads used from the site to the landfill.

No Action – No impact to demand for government services.

19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS:

List State, County, City, USFS, BLM, Tribal, and other zoning or management plans, and identify how they would affect this project.

Project activities will occur on City of Deer Lodge owned property. Current conditions are compatible with current ownership and zoning. The area is currently zoned as I-1 (Industrial and Manufacturing District) along the east side generally where the former railroad tracks were located, B-1 (Central Business District) in the undeveloped blocks and lots to the north of the city utility maintenance shop, and AS (Agricultural Suburban District) in the area north and west of B-1 and I-1 to the northern boundary of the city limits. Finally, there is a small portion of Parks and Open Space District to the north of the AS zoning that extends north to Cottonwood Creek (and the city limits) and west to the Clark Fork River. Refer to the zoning map located on the City of Deer Lodge's website at: https://www.deerlodgecity.com/zoning-maps

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area is consistent with local ordinances, resolutions and plans and will have no impact on these legal instruments.

No Action – No impact to locally adopted environmental plans or goals.

20. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES:

Identify any wilderness or recreational areas nearby or access routes through this tract. Determine the effects of the project on recreational potential within the tract. Identify direct, indirect, and cumulative effects to recreational and wilderness activities.

Although this is proposed project is occurring on city owned property, there is currently no public access to these lands or the surrounding floodplain or Clark Fork River.

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area is anticipated to be the next critical step for the potential for redevelopment of this property into an open space park concept that can serve the community of Deer Lodge and the residents of Montana with a variety of compatible uses include a new access to the Clark Fork River, a trail system and picnic areas. However, the creation of an open space park is a separate action which may or may not happen therefore there will be no impact.

No Action – No action could continue to cause contaminants in the soil to pollute the environment and therefore limit prudent access and redevelopment of this site into an open space park with the potential for direct access to the Clark Fork River. The current status quo would be preserved and there would be no creation of public open space within this city owned property.

21. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING:

Estimate population changes and additional housing the project would require. Identify direct, indirect, and cumulative effects to population and housing.

According to the US Census Bureau there are 169 employer establishments in Powell County with an annual payroll of $42.9 M (2019 data).
(https://www.census.gov/quickfacts/fact/table/powellcountymontana/POP060210). The population of the City of Deer Lodge is reported to be declining and stands at approximately 2733. There are no dwelling structures on the property and the current conditions appear to have no impacts on these trends.

According to the US Census Bureau there are 3287 housing units in Powell County
(https://www.census.gov/quickfacts/fact/table/powellcountymontana/POP060210). Home prices appear to be more affordable in Powell County than in other parts of the state and although the median household income is only slightly lower than the state median income ($54,667 vs $54,970) the median house value is $143,100 in Powell County vs $230,600 for the state. Median gross rents are also lower in Powell County vs statewide ($688 vs $810). The quality of housing in Powell County is presumed to be of average condition.

Proposed Alternative— The proposed alternative of contaminated soil removal from the project area could

have direct and indirect benefits to local businesses and residents through the direct purchase of construction materials and supplies, including fuel, oil, tools and equipment. There could be indirect beneficial effects as the money from these direct purchases filters through the community through secondary and residual purchases to resupply these materials purchased by the contractor and used on this project.

The proposed alternative of contaminated soil removal from the project area will not be of sufficient duration or magnitude to impact on the quality, quantity and affordability of housing in the community.
No Action – No impact to density and distribution of population and housing.

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22. SOCIAL STRUCTURES AND MORES:
Identify potential disruption of native or traditional lifestyles or communities.

The current condition of the area is that it is owned by the city of Deer Lodge and not open, available, or readily accessible to the general public.

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area is anticipated to allow for the creation of an open space park in the future once contaminated soil is removed from the site. However, that is a separate action which may or may not happen therefore there will be no impact on the social structures and mores of the community resulting from this project.

No Action – The no action alternative will have no impact is expected to change social structures and mores because the area is owned by the City of Deer Lodge and is not open, available, or readily accessible to the general public.

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23. CULTURAL UNIQUENESS AND DIVERSITY:
How would the action affect any unique quality of the area?

The project area is currently an open meadow with only two buildings (the city utility shop and the Park Street well house) owned by the City of Deer Lodge. There are no known cultural facilities, unique cultural features or diversity associated with the project area.

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area will have no impact on the cultural facilities, unique cultural features or diversity, if any, in the area.

No Action – No impact to cultural uniqueness and diversity.

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24. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:
Include appropriate economic analysis. Identify potential future uses for the analysis area other than existing management. Identify direct, indirect, and cumulative economic and social effects likely to occur as a result of the proposed action.

Project activities will occur on City of Deer Lodge owned property. Property surveys were performed in areas where private property and landowner concerns existed regarding the proposed activities. Current conditions are compatible with current ownership and zoning.

The project area is currently an open meadow with only two buildings (the city utility shop and the Park Street well house). Since this property is owned by the City of Deer Lodge there are no current growth or redevelopment plans for this site except for the potential to create an open space park on this property in the future.

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area will not affect private property rights as no activities are planned on private properties. The proposed alternative of contaminated soil removal from the project area is anticipated to allow for the creation of an open space park in the future once contaminated soil is removed from the site. However, that is a separate action which may or may not happen; therefore, there will be no impact on land use compatibility (growth, land use change,

development activity, adjacent land uses and potential conflicts) resulting from this project.

No Action – No impact to other appropriate social and economic circumstances.

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25. DRINKING WATER AND/OR CLEAN WATER

Identify potential impacts to water and/or sewer infrastructure (e.g., community water supply, stormwater, sewage system, solid waste management) and identify direct, indirect, and cumulative effects likely to occur as a result of the proposed action.

The project area is currently an open meadow with only two buildings (the city utility shop and the Park Street well house) owned by the City of Deer Lodge. The Park Street well is a public water supply well that is part of the city's public water supply system. However, it is contaminated with naturally occurring arsenic which exceeds the EPA's drinking water standard of 10 parts per billion (ppb) so it is currently not in use. The city shop is served by a city water main.

The project area is currently an open meadow with only two buildings (the city utility shop and the Park Street well house) owned by the City of Deer Lodge. The city shop is served by solid waste services and waste is hauled to the Powell County Landfill. There are no known landfill capacity issues in this area.

The project area is currently an open meadow with only two buildings (the city utility shop and the Park Street well house) owned by the City of Deer Lodge. The city shop is served by a city sewer main.

The project area is currently an open meadow with only two buildings (the city utility shop and the Park Street Well house) owned by the City of Deer Lodge. There are no paved or impervious areas on the site. The city shop is served by a city water main. There are no known storm water management or surface water drainage issues in this area.

Proposed Alternative – The proposed alternative of contaminated soil removal from the project area will have no impact on the community water system.

The proposed alternative of contaminated soil removal from the project area will have some minor direct, localized impact on solid waste management in the area of a non-recurring nature. Butte Silver Bow County Landfill has been contacted and is able and willing to receive the contaminated soils generated at this site. There is a tipping fee for disposal of these materials but this landfill is designed and permitted for this type of material so there could be both a beneficial impact to their operations (revenue generation) as well as an adverse impact (reduction in landfill capacity).

The proposed alternative of contaminated soil removal from the project area will have no impact on the local sewage system or wastewater treatment.

The proposed alternative of contaminated soil removal from the project area will have no impact surface water drainage patterns because the site will be restored to pre-existing conditions, slopes and grades with a similar type of cover (vegetation for vegetated areas and gravel for roads and the utility yard areas). However, there are anticipated to be minor, temporary adverse, direct and indirect impacts to storm water generated at the site from soil removal activities. These impacts to storm water are anticipated to be non-recurring and since there will be greater than one acre of disturbance at this site a Montana Department of Environmental Quality General Permit for Storm Water Discharges Associated with Construction Activity https://deq.mt.gov/files/Water/WQInfo/Documents/MT-17-09/MT%2017-092017_DPER_MTR100000_edited.pdf This permit, among other things, requires the contractor to prepare a Stormwater Pollution Prevention Plan (SWPPP) and implement and maintain stormwater best management practices (BMPs). In addition, all disturbed areas on the site will be revegetated in accordance with this permit and construction plans. Over a longer time horizon, storm water generated from this site should be cleaner once contaminated soils are removed from the site and vegetation is reestablished in accordance with the project plans and required permits.

No Action — No impact to drinking water and/or clean water facilities.

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V. FINDING

25. ALTERNATIVE SELECTED:

1. Characterize, Remove and Dispose of Contaminated Soils, Groundwater Remediation: The details of this alternative is discussed in detail in the Remediation Proposal. In summary, the City of Deer Lodge would utilize RDGP funds to contract remaining characterization soils, groundwater and proceed with the removal and disposal of as much on the on-site metals contaminated soil and remediation of groundwater as possible.

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

The proposed alternative of contaminated soil removal from the project area could generate some relatively minor amounts of fugitive dust on a localized, temporary basis during excavation and transportation activities. These impacts will be managed by wetting, which will control dust and any lead adhering to dust particles. Remedial actions will be halted if significant dust is generated and will not resume until adequate dust control measures are in place. This minor, temporary adverse impact is anticipated to be non-recurring as disturbed areas on the site will be revegetated in accordance with the Montana Department of Environmental Quality General Permit for Storm Water Discharges Associated with Construction Activity https://deq.mt.gov/files/Water/WQInfo/Documents/MT-17-09/MT%2017-092017_DPER_MTR100000_edited.pdf which will be necessary for this project since there will be greater than one acre of disturbance at this site.

The proposed alternative would remove the contaminated soils from the wetland areas within the PRA—a long term direct benefit to this resource; however, in order to do so there would be temporary direct and indirect minor impacts to portions of these localized wetlands during construction activity. Direct impacts include the removal of contaminated soils from approximately 0.05 acres of wetlands, and indirect temporary impacts could result from upland construction activities (storm water runoff for example) causing sedimentation in wetlands. These temporary direct and indirect impacts would be mitigated by adhering to all requirements of the Army Corps of Engineers 404 nationwide permit 38 for impacts to jurisdictional wetlands that will be required in order to perform this cleanup of hazardous materials work within the wetlands. These impacts are anticipated to be non-recurring.

There will be minor temporary adverse impacts to vegetation and associated habitats during contaminated soil removal activities. These temporary direct impacts to these vegetation and habitat resources could indirectly impact various wildlife and aquatic species at or in the vicinity of the project area on a temporary or seasonal basis. These direct and indirect impacts are anticipated to be local and non-recurring. However, after soil removal activities are completed, revegetation will occur during the first appropriate period for favorable planting conditions and within 90 days of final seedbed preparation and annual inspection of revegetation efforts will be performed until the revegetation is successful. No trees are anticipated to be disturbed during this project and this work is anticipated to occur outside of the nesting season. No work or direct impacts are anticipated to the river or creek that could potentially affect these habitats. There is a long-term beneficial impact to these vegetation and wildlife species and habitats including fish, by the removal of contaminated soils from the project area.

The proposed alternative of contaminated soil removal from the project area will have a long-term beneficial

impact on the overall public health. There are also anticipated to be long term cumulative benefits of all the past and proposed soil removal actions on public health in this community and the state. There may be some localized, short term, minor, non-recurring temporary adverse health effects during construction activity, borne primarily by construction workers exposed to contaminated soil. However, these impacts can be minimized and avoided to the extent possible by proper training, equipment and safety practices. The contractor (and all persons working on the site will be required to have a minimum of 24 hour (most workers will be required to have a 40 hour) United States Department of Labor Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) required training.

The proposed alternative of contaminated soil removal from the project area will have no impact surface water drainage patterns because the site will be restored to pre-existing conditions, slopes and grades with a similar type of cover (vegetation for vegetated areas and gravel for roads and the utility yard areas). However, there are anticipated to be minor, temporary adverse, direct and indirect impacts to storm water generated at the site from soil removal activities. These impacts to storm water are anticipated to be non-recurring and since there will be greater than one acre of disturbance at this site a Montana Department of Environmental Quality General Permit for Storm Water Discharges Associated with Construction Activity https://deq.mt.gov/files/Water/WQInfo/Documents/MT-17-09/MT%2017-092017_DPER_MTR100000_edited.pdf This permit, among other things, requires the contractor to prepare a Stormwater Pollution Prevention Plan (SWPPP) and implement and maintain stormwater best management practices (BMPs). In addition, all disturbed areas on the site will be revegetated in accordance with this permit and construction plans. Over a longer time horizon, storm water generated from this site should be cleaner once contaminated soils are removed from the site and vegetation is reestablished in accordance with the project plans and required permits.

The proposed alternative of contaminated soil removal from the project area will have a direct temporary impact on the local road network in the area when the contaminated soil is removed via covered trucks and transported to the landfill. However, the number of trucks per hour (estimated to be up to 10-12 per hour) would have an almost negligible impact on the capacity of the local streets and roads. This adverse impact is anticipated to be non-recurring after construction activities are completed. These loads will be required to be covered and there are no weight restrictions on the roads used from the site to the landfill.

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27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

[ ]	EIS	[ ]	More Detailed EA	[X]	No Further Analysis

EA Approved By:	**Name:**	Mark Bostrom
	Title:	CARD Division Administrator
Signature:	DocuSigned by: Mark W Bostrom BF7A1C50B2AF4DE...	**Date**: 10/26/2021 | 4:02:34 PM MDT